

Ron Buckhalt
Manager, BioPreferred Program
U.S Department of Agriculture
342 Reporters Building
300 7th St. S.W.
Washington, DC 20024

Dear Mr. Buckhalt:

This letter is sent in response to your request for documentation of the process to determine whether mature markets exist for the biobased products covered in the eighth round of product category designations.

Throughout the development phase of this program, Iowa State University representatives have been in direct contact with personnel from manufacturing sales and management, manufacturing associations, and industry researchers. Communications with these stakeholders support our conclusion that while the concept of products based on renewable resources is not a new one, the majority of manufacturers producing biobased products are relatively new to the market. At this point we have not explicitly asked manufacturers to tell us if they had a national market share in 1972, however, this could be added to our process in the future if USDA makes it a requirement.

The following actions have been taken to identify the market status for eighth round product categories.

Air Fresheners and Deodorizers - The first company was founded in 1895. The first year biobased production was in 1912

Asphalt and Tar Removers - The first company was founded in 1958. The first year biobased production was in 1981

Asphalt Restorers - The first company was founded in 1927. All biobased productions started in early 2000

Blast Media - The first company was founded in 1888 and it started producing biobased products in the same year

Candles and Wax Melts - The first company was founded in 1863. The first year biobased production was also in 1963

Electronic Components Cleaners - The first company was founded in 1977 and it started producing biobased products in the same year

Floor Coverings (Non-Carpet) - The first company was founded in 1864. The first year biobased production was in 1868

Foot Care Products - The first company was founded in 1967. The first year biobased production was in 1967

Furniture Cleaners and Protectors - The first company was founded in 1894. The first year biobased production was in 1894

Inks - Specialty - The first company was founded in 1884. The first year biobased production was in 1918

Inks - News - The first company was founded in 1840. The first year biobased production was in 1918

Inks - Sheetfed - The first company was founded in 1765. The first year biobased production was in 1918

Inks – Printer Toners - The first company was founded in 1949. The first year biobased production was in 1998

Packing and Insulating Materials - The first company was founded in 1889. The first year biobased production was in 1937

Pneumatic Equipment Lubricants - The first company was founded in 1909. The first year biobased production was in 1989

Wood and Concrete Stains - The first company was founded in 1866. The first year biobased production was in 1974

Based on this information we feel all of the proposed product categories qualify as new market development and should be included in the designation ruling. However, if USDA finds it necessary to have confirmation from individual companies, we would be happy to reallocate a portion of this year's testing funds to support this activity.

Sincerely

Steven L. Devlin

5/25/2010